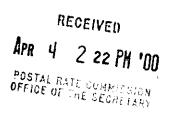
BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001



POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS XIE TO INTERROGATORIES OF THE ALLIANCE OF NONPROFIT MAILERS (ANM/USPS-T1-1-16)

The United States Postal Service hereby provides the responses of witness Xie to the following interrogatories of the Alliance of Nonprofit Mailers:

ANM/USPS-T1-1-16, filed on March 21, 2000.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Kenneth N. Hollies

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Kenneth N. Hollies

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–3083 Fax –5402 April 4, 2000

MPA/USPS-T1-1. Please confirm that the TRACS highway sample frame excludes contracts for which the destination is a railroad yard. If not confirmed, please describe how such movements are sampled in TRACS.

RESPONSE.

Confirmed.

MPA/USPS-T1-2. Please confirm that the TRACS highway sample frame does not exclude contracts for which the origin is a railroad yard. If confirmed, please identify (in machine-readable form) TRACS highway observations for which the origin is a railroad yard. If not confirmed, please describe the process through which such movements are excluded.

RESPONSE

Confirmed. However, after careful examination, no such observations were found in the TRACS BY98 highway sample.

MPA/USPS-T1-3. Please refer to Exhibit 2 on page 3 of USPS LR-H-78 from Docket No. R97-1. Please confirm that this provides the allocations of TRACS highway samples by contract type utilized in BY98. If not confirmed, please provide the base year allocations. In either case, please provide a concise description of the process through which the allocations are developed, and their use in the expansion process for TRACS observations.

RESPONSE

Not confirmed. The base year allocations are documented in LR-I-52, Section IV. The allocation for BY96 formed the basis for the allocation in BY98. Some adjustments were made for the Intra-BMC and the Intra-SCF contract types. The Intra-BMC allocation was changed to alleviate a concern expressed in R97-1 about the imbalance in sample sizes between inbound and the outbound routes. Starting in PQ3, BY98, the Intra-SCF sample allocation was changed in the 1st (Inbound BMC/SCF) and 2nd (inbound-Other) strata to avoid a potential problem where all tests are with zero volume.

In the expansion process, after adjustment for non-response, the reciprocal of the selection probability is applied to each observation in the stratum. This is a typical Horvitz -Thompson type estimator, under the assumption that observations are missing at random. It produces unbiased estimates for the cubic-foot-mile numbers used in the distribution key calculation. See LR-I-52, section 7 for the exact formulas used in the expansion process.

MPA/USPS-T1-4. At the time the TRACS sample is drawn, please describe the information that is available regarding the frequency and schedule for contracts that operate on a per-trip, as-needed basis. Please describe the use of such information in the sampling process.

RESPONSE

TRACS only samples regular contract routes. The contracts that operate on a per-trip, as-needed basis are not in the sampling frame.

MPA/USPS-T1-5. For BY98, please provide the proportion of 'zero-volume tests" by highway contract type found during the TRACS sampling process. Of these, please indicate the proportion that occur at the same point as the trip origin (i.e., empty returns).

RESPONSE

Proportion of Zero-Volume Tests by Contract Type in BY98

Contract type	Inter-BMC	Inter-SCF	Intra-BMC	Intra-SCF
Zero volume	13%	19%	24%	27%

Five of the 1,424 zero-volume tests occurred at the origin. Most highway trips, as defined by its route-trip number, do not return to the origin.

MPA/USPS-T1-6. Please confirm that TRACS does not sample movements made using 'Roadrailers" on Amtrak. If you do not confirm, please provide documentation of the sampling process, including sample selection, field data collection and the identification of FY98 TRACS records for Amtrak Roadrailer movements.

RESPONSE

Confirmed.

MPA/USPS-T1-7. Please provide documentation of the instructions provided to field data technicians in sampling mail moving in 3910A Amtrak containers.

RESPONSE

By '3910A Amtrak containers', I assume you are referring to the containers that TRACS refers to as OTRs and BMCs. The documentation of the instructions provided to field data collectors in sampling mail moving in that type of container can be found in LR-I-18, Chapter 5, Sections 8 and 10.

MPA/USPS-T1-8. Please provide copies of the Amtrak sample frames for FY96 and FY97.

RESPONSE

The FY96 Amtrak sampling frames were provided in USPS-LR-H-80, part 1:

PQ1 pages 37-39

PQ2 pages 70-72

PQ3 pages 103-105

PQ4 pages 137-139.

See the attachment for the FY97 frames.

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MPA/USPS-T1-9. Please provide the best available estimate of the frequency with which "set-aside" items (other than pallets) selected in TRACS Amtrak tests and labeled with green tags are not sampled at the "downstream" postal facility. In machine-readable form, please identify Amtrak tests for which set-aside items (other than pallets) were not sampled.

RESPONSE

No data are available on the frequency with which set-aside items are selected in Amtrak tests and not sampled at the downstream postal facility. Data collectors are instructed to tag all set-aside mail and sample it when it arrives at the downstream postal facility.

MPA/USPS-T1-10. Please state the date on which the selection of TRACS highway samples converted to the new system of accounts. Please identify what procedural changes in TRACS were necessitated by changes in operations under the new system of accounts.

RESPONSE

The TRACS Highway sample selection converted to the new system of accounts for PQ 3 of FY 1997. The TRACS programs for sample selection, data editing, and expansion (to produce distribution keys) were revised to reflect that change.

MPA/USPS-T1-11. Instructions provided to TRACS field data technicians state that '(p)lant load transportation , (is] not eligible for selection." (Docket R94-1, USPS-LR-G-112, Section 252.) Please state what instructions are provided for cases where the contract selected from the frame for a TRACS highway test is a plant load movement.

RESPONSE

In the process of developing the TRACS highway sampling frame, 'plant loaded' facilities are excluded. Data collectors are instructed not to sample plant loaded transportation (see USPS-LR-I-18, Handbook F-65, page 5-16).

MPA/USPS-T1-12. Please state why TRACS samples only freight rail movements that originate at BMC's. Please state what fraction of freight rail movements in BY98 originated at points other than BMC's.

RESPONSE

My understanding is that the overwhelming majority of rail movements originate at BMC's. In BY98, data needed to calculate the requested fraction were not captured. More recent data, for March 2000, indicate that 34 percent of freight rail movements do not originate at BMC's, but 78 percent of these movements are for empty equipment.

MPA/USPS-T1-13. Please state whether the current TRACS Instruction Manual differs from the document supplied as USPS LR-G-112 in Docket No. R94-1. If so, please provide a copy of the current version.

RESPONSE

The current TRACS data collection handbook is different from the document provided as LR-G-112. See USPS-LR-I-18 for the current version of the Handbook F-65. TRACS data collection instructions are contained in Chapters 2 and 5.

MPA/USPS-T1-14. Please confirm that TRACS does not sample exceptional, emergency or Christmas accounts in purchased highway transportation. If confirmed, please indicate why such accounts are not sampled. If not confirmed, please explain.

RESPONSE

Confirmed. Although I am uncertain why emergency and Christmas accounts are not sampled in the TRACS Highway Subsystem, it is my understanding that this has consistently been the practice since TRACS was first implemented. My understanding is that exceptional service trips are not included in the NASS database, and are not scheduled sufficiently in advance to allow for their inclusion in the TRACS sample.

MPA/USPS-T1-15. Please refer to Footnote 11 on page 38 of USPS-LR-I-52. Please describe the nature and magnitude of the revision, and the factors that necessitated it.

RESPONSE

The revision corrects for a programming error, which was discovered after the Cost Segment 14 B Workpapers were finalized. In the version included in the Cost Segment 14B Workpapers, a constant value replaced the variable value representing vehicle capacity. See Tables 1-4 and Table 10 of my testimony (USPS-T-1) for the magnitude of the revision.

MPA/USPS-T1-16. Please provide the addresses of the facilities referred to in the Amtrak sampling frame as "DVD Facility" and "Phil-AMC".

RESPONSE

The DVD facility is the Dominick V. Daniels facility in Kearny, NJ. The Phil-AMC is the Philadelphia Air Mail Center.

DECLARATION

I, Jennifer J. Xie, hereby declare under peare true and correct to the best of my known	enalty of perjury that the foregoing answers wledge, information and belief.
•	Jennifer J. Xie

Date: Apr. 1 4, 2000